

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

United States ex rel. Dr. Susan Nedza,	)	
	)	
Plaintiff-Relator,	)	No. 15-cv-6937
	)	
v.	)	Judge Jorge L. Alonso
	)	Magistrate Judge Susan E. Cox
American Imaging Management, Inc.	)	
	)	
Defendant.	)	

**JOINT STATUS REPORT**

Plaintiff-Relator Dr. Susan Nedza and Defendant American Imaging Management, Inc. (“AIM”), jointly submit this status report.

I. Discovery and Pending Motions

A. There are no pending motions.

B. Discovery is ongoing.

- i. The Parties have served and responded to written discovery consisting of requests for production, interrogatories, and requests for admission. The parties met and conferred on various issues raised by the written discovery, none of which has resulted in current motion practice.
- ii. Both parties have made rolling document productions, which will continue.
- iii. The Court entered an ESI protocol, and the parties continue to comply with its terms and confer in good faith about electronic discovery. AIM continues ESI collection, review, and production on a rolling basis.
- iv. As previously stated, discovery in this case is extensive, including significant electronic discovery. The Parties have been seeking discovery from dozens of third parties, including Medicare Advantage Plans and

insurance companies. Most recently, on August 25, Relator served 26 subpoenas on Anthem, Inc. and several of its subsidiaries.

- v. The Parties continue to meet and confer on a number of topics related to discovery including production, privilege logs, and other topics. The Parties will request an informal discovery conference if one is needed.
- vi. The close of fact discovery currently is March 31, 2022. (Dkt. 294, 298).

## II. Settlement

A. Relator served an initial settlement demand and AIM has since provided a counter-offer. The parties have also agreed to proceed to a mediation on November 15, 2021.

Dated: October 13, 2021

*Respectfully Submitted:*

*Counsel for Defendant American Imaging  
Management, Inc.*

*Counsel for Relator*

/s/ Lisa Noller

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